

1 HOJOON HWANG (State Bar No. 184950)
hojoon.hwang@mto.com

2 MIRIAM KIM (State Bar No. 238230)
miriam.kim@mto.com

3 LAURA K. LIN (State Bar No. 281542)
laura.lin@mto.com

4 MUNGER, TOLLES & OLSON LLP
560 Mission Street
5 Twenty-Seventh Floor
San Francisco, California 94105-2907
6 Telephone: (415) 512-4000
Facsimile: (415) 512-4077

7 WILLIAM D. TEMKO (State Bar No. 98858)
william.temko@mto.com

8 CLAIRE YAN (State Bar No. 268521)
claire.yan@mto.com

9 JESSICA BARCLAY-STROBEL (State Bar No. 280361)
jessica.barclay-strobel@mto.com

10 MUNGER, TOLLES & OLSON LLP
11 355 South Grand Avenue
Thirty-Fifth Floor
12 Los Angeles, CA 90071-1560
Telephone: (213) 683-9100
13 Facsimile: (213) 687-3702

14 *Attorneys for Defendants LG Electronics, Inc.,*
and LG Electronics U.S.A., Inc., LG Electronics
15 *Taiwan Taipei Co., LTD*

16 *Additional Moving Defendants and Counsel*
17 *Listed on Signature Pages*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

19 IN RE: CATHODE RAY TUBE (CRT)
20 ANTITRUST LITIGATION

Master File No. 3:07-md-05944-sc (N.D.Cal)

MDL No. 1917

21 This Document Related to:

22 DIRECT PURCHASER ACTIONS
23

DECLARATION OF RICHARD C.
WINGATE IN SUPPORT OF DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT AS
TO LG AND MITSUBISHI SUBSIDIARIES

[Notice of Motion for Summary Judgment,
Declaration of Jessica Barclay-Strobel,
Declaration of Mavis Chou, and Declaration of
Matthew Kim, and [Proposed] Order filed
concurrently herewith]

Judge: Hon. Samuel Conti

Date: February 6, 2015

Time: 9:00 AM

Crtrm.: 1, 17th Floor

3:07-MD-05944-SC, MDL1917

DECLARATION OF RICHARD C. WINGATE IN SUPPORT OF
MOT. FOR SUMM. J. AS TO LG AND MITSUBISHI SUBSIDIARIES

Declaration of Richard C. Wingate

I, Richard C. Wingate, declare as follows:

1. I am the Vice-President and General Counsel at LG Electronics U.S.A., Inc., (“LGEUSA”), a position I have held since October, 2004. I have been employed at LGEUSA since October, 2004. All statements in this Declaration are based on my personal knowledge. If I were called upon to testify, I could and would testify to each of the facts set forth herein.

2. LGEUSA is incorporated in Delaware and headquartered in New Jersey.

3. LGEUSA has never manufactured, marketed, sold, or distributed cathode ray tube (“CRTs”). LGEUSA has never manufactured products, such as televisions or computer monitors, that contain CRTs. Instead, LGEUSA distributed CRT finished products that were manufactured by its parent company, LG Electronics, Inc. (“LGEI”), or LGEI’s wholly-owned subsidiaries.

4. From March 1, 1995, through December 31, 1999, LGEI owned a majority interest in LGEUSA and thereafter LGEUSA has been a wholly-owned subsidiary of LGEI.

5. LGEUSA does not commingle its financial assets with LGEI. LGEUSA maintains separate corporate bank accounts from LGEI.

6. LGEUSA maintains independent financial records and reports its annual profits and losses separately from LGEI.

7. LGEUSA holds regular board meetings.

8. LGEUSA does not share office space with LGEI. LGEUSA does not employ individuals at the same time that they are employed by LGEI.

9. LGEI is not involved in the day-to-day operation of LGEUSA.

10. LGEUSA has never owned any shares in LG.Philips Displays (“LPD”) or its subsidiaries (“LPD”). LPD has never owned any shares of LGEUSA.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 4th day of November, 2014 in Englewood Cliffs, New Jersey.

By: _____


Richard C. Wingate